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Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007

August 22, 2008
Motion denied, Def't fails to show how time was used, nor adequately effort to communicate w/ pl. Def't may renew motion after correcting the deficiencies. 8-25-08
Chk Heller

Re: Viguera v. New York City Health and Hospitals Corporation
07 Civ. 07227 (AKH) (AJP)
Our Number: 2007-027449

Dear Judge Hellerstein:

I am the Assistant Corporation Counsel assigned to defend the above-referenced matter. As of yesterday, August 20, 2008, I am the new Assistant Corporation Counsel assigned to defend this matter. I write to respectfully request an extension of time from August 30, 2008 to October 15, 2008 for parties to complete discovery in this case. I also write to respectfully request an extension of time from October 30, 2008 to December 16, 2008 for defendant to serve its summary judgment motion. This is defendant's first request for an extension of the discovery period and defendant's first request for an extension of time to serve its summary judgment motion. I contacted plaintiff's counsel by email and by telephone to determine if he consents to this request but I have not received a response.

The attorney previously assigned to this case is leaving this office and the case has, therefore, been reassigned to me. Due to pre-existing work and personal obligations, I will need additional time to familiarize myself with the facts of the case, to complete discovery and to gather relevant documents necessary to support a summary judgment motion. As such, defendant respectfully requests an extension of time until October 30, 2008 to complete discovery and until December 15, 2008 to file its summary judgment motion in this action.

HONORABLE ALVIN K. HELLERSTEIN

United States District Judge

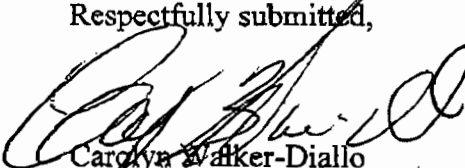
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August 21, 2008

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Respectfully submitted,



Carolyn Walker-Diallo
Assistant Corporation Counsel

c: Roosevelt Theodore Seymour (By Facsimile)